

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

---

In the matter of  
RAYMOND ZDUNSKI

Plaintiff,  
-vs-

ERIE 2 CHAUTAUQUA-CATTARAUGUS BOARD  
OF COOPERATIVE EDUCATIONAL SERVICES,  
DAVID O'ROURKE, in his official capacity,  
JOHN O'CONNOR, in his official capacity,  
BRIAN LIEBENOW, LAURIE BURGER, and  
TRACY SMITH-DENGLER;

Defendants.

---

MOTION MADE BY:

Defendants, Erie 2 Chautauqua-Cattaraugus Board of Cooperative Educational Services, David O'Rourke, in his official capacity, John O'Connor, in his official capacity, Brian Liebenow, Laurie Burger, and Tracy Smith-Dengler

DATE, TIME AND  
PLACE OF HEARING

On a date to be set by the Court at  
the United States District Court  
for the Western District of New  
York.

RELIEF SOUGHT:

Summary Judgment in favor of  
Defendants pursuant to Rule 56  
of the Federal Rule of Civil  
Procedure and such other relief as  
deemed proper.

SUPPORTING PAPERS:

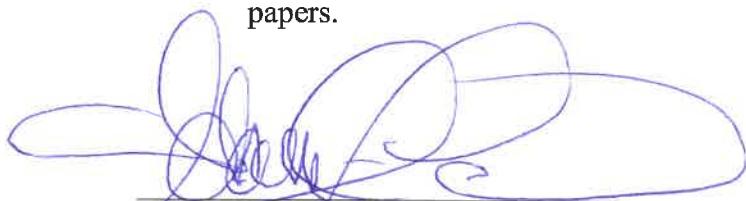
Statement of Undisputed Facts;  
Affidavit of Adam C. Ferrandino,  
Esq., dated October 14, 2021,  
with all attached Exhibits;  
together with the accompanying  
Memorandum of Law, and all the

pleadings and proceedings  
hereinbefore had herein.

ANSWERING PAPERS:

Dated: October 14, 2021  
Buffalo, New York

Any answering papers must be served in accordance with the Federal Rules of Civil Procedure and any briefing schedule set by the Court. The Defendants request the opportunity to submit reply papers.



Adam C. Ferrandino, Esq.  
Attorneys for Defendants  
ERIE 2 CHAUTAUQUA-  
CATTARAUGUS BOARD OF  
COOPERATIVE EDUCATIONAL  
SERVICES, DAVID O'ROURKE, in his  
official capacity, JOHN O'CONNOR, in his  
official capacity, BRIAN LIEBENOW,  
LAURIE BURGER, and TRACY SMITH-  
DENGLER  
1000 Rand Building  
14 Lafayette Square  
Buffalo, New York 14203  
(716) 852-5875  
aferrandino@feldmankieffer.com

TO: Kristina S. Heuser, Esq.  
TYLER & BURSCH, LLP  
Attorney for Plaintiff  
RAYMOND ZDUNSKI  
25026 Las Brisas Road  
Murrieta, CA 92562  
(951) 600-2733  
kheuser@tylerbusch.com